1:18MJ4013-JDG

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

AFFIDAVIT

- I, Myrick Dennis, with the Cleveland Field Office of the United States Postal Inspection Service (hereinafter "USPIS"), having first been duly sworn according to law, hereby depose and say:
- 1. As a United States Postal Inspector, I am an investigative law enforcement officer of the United States of America within the meaning of Title 18, United States Code, Section 2510(7). I am empowered by law to conduct investigations of, and to make arrests for, federal felony offenses related to the Postal Service and the mails, as authorized by Title 18, United States Code, Section 3061.
- 2. I have been employed by the USPIS for 3 years and assigned to the Cleveland Field Office for each of those 3 years. During this time, I have been assigned to the Prohibited Mail Narcotics team, which investigates the mailing of illegal drugs and their proceeds. I have been the case agent in multiple investigations leading to convictions in both U.S. District Court and state courts.
- 3. I have received training in the detection and investigation of prohibited mailing offenses during a 12-week residential Basic Inspector Training program in Potomac, Maryland. I have also received training in financial investigations as they relate to drug trafficking organizations, money laundering, and asset forfeiture. I have received field training and participated in many aspects of USPIS drug investigations, including but not limited to, parcel interdiction, surveillance, controlled deliveries, interview and interrogation, confidential source/cooperating witness debriefing, and interception and analysis of electronic

communications. I am familiar with drug traffickers' methods of operation, especially as they relate to the Postal Service, including the storage, transportation, and distribution of drugs, the transfer and collection of money which represents the proceeds of drug trafficking, and money laundering.

- 4. This affidavit is submitted in support of a criminal complaint against Corey BROWN.
- 5. Because this affidavit is submitted for the limited purpose of supporting a criminal complaint, I have not included each and every fact known concerning this investigation. I have set forth only the facts I believe are necessary to establish probable cause that Corey BROWN has committed violations of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), 841(b)(1)(B), and 846, that is conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, and conspiracy to distribute and distribution of 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.
- 6. I know from my training and experience that the U.S. Mail is often used by narcotics traffickers to transport controlled substances. I further know that the Priority Mail system is commonly used to transport controlled substances because this system provides reliability, traceability, and timely delivery.
- 7. I know from my training and experience that drug traffickers who use the U.S. Mail for the purpose of transporting controlled substances often use fictitious, incomplete, or misspelled names and/or addresses on parcels to conceal their true identities from law

enforcement. I also know from my training and experience that drug traffickers sometimes utilize collusive postal employees to provide safe passage for their drug parcels.

Two Kilogram Cocaine Seizure, Identification of BROWN

- 8. Since June 2017, Postal Inspectors have been investigating the trafficking of kilogram quantities of cocaine and methamphetamine mailed from the Los Angeles, California, area to the Cleveland, Ohio, area. More specifically, on June 16, 2017, I obtained and executed a federal search warrant (1:17MJ3149) for USPS Priority Mail parcel no. 9505 5130 0912 7163 0698 24 addressed to Kathy Monroe, 14002 Triskett Rd, Cleveland, OH 44111, and having a return address of Walter Monroe, 13522 Chadron Ave #110, Hawthorne, CA 90250 (hereinafter "Triskett Parcel 9824"), resulting in the seizure of approximately 2 kilograms of white compressed powder in 2 bricks. The bricks were each wrapped in multiple layers of tape and vacuum sealed bags and concealed as a unit inside a clear plastic Sterilite container wrapped in wedding wrapping paper. This wrapped bundle was cushioned inside the exterior plain white 3M Company box using white packing peanuts.
- 9. On July 12, 2017, USPIS Forensic Laboratory Services determined the white compressed powder seized from Triskett Parcel 9824 to contain cocaine hydrochloride, a Schedule II controlled substance, and to weigh 1974.3 grams.
- 10. On July 27, 2017, USPIS Forensic Laboratory Services reported a positive identification of Corey BROWN (hereinafter "BROWN") from four latent fingerprints on the exterior of the outer box of Triskett Parcel 9824.
- 11. I subsequently reviewed surveillance video of the mailer of Triskett Parcel 9824. A comparison of the video with an Ohio driver's license photo of BROWN resulted in a positive identification of BROWN as the mailer.

12. I also reviewed surveillance video of the mailer of USPS Priority Mail parcel no. 9505 5125 0642 7159 0905 20 addressed to Kathy Monroe, 14002 Triskett Rd, Cleveland, OH 44111, and having a return address of Leon Monroe, 3150 Wilshire Blvd #723, Los Angeles, CA 90005 (hereinafter "Triskett Parcel 0520"). Triskett Parcel 0520 had been delivered approximately one week prior to the seizure of Triskett Parcel 9824 and also bore many similarities to it (including recipient address, shipping material, weight, mail service, mailing location, and handwriting), and was therefore suspected to contain controlled substances. A comparison of the video with an Ohio driver's license photo of BROWN resulted in a positive identification of BROWN as the mailer of this parcel as well.

Five Pound Methamphetamine Seizure, Further Identification of BROWN

- 13. On September 8, 2017, I identified USPS Priority Mail parcel no. 9505 5265 4511 7250 1244 34 addressed to "Liliya Dubow, 23515 E Silsby, Beachwood, OH 44122," and having a return address of "Peter Dubow, 232 E 2ndnd [sic] Street #213, Los Angeles, CA 90012" (hereinafter "East Silsby Parcel 4434") as a suspected drug parcel en route to Ohio. I then obtained a federal anticipatory search warrant (1:17 MJ 3220) for this parcel.
- 14. On September 10, 2017, I executed the anticipatory search warrant on East Silsby Parcel 4434, resulting in the seizure of approximately 5 pounds of a white crystalline substance that field tested positive for methamphetamine. The methamphetamine was concealed as a 4-pound bundle and a 1-pound bundle inside a clear Sterilite tub with a blue lid covered with black cellophane and gold and white striped wrapping paper. The wrapped bundle was cushioned inside the exterior box using white packing peanuts. The parcel also contained a blank "Happy Grandparents Day" greeting card. (On October 6, 2017, USPIS Forensic Laboratory Services determined the white crystalline substance seized from East Silsby Parcel 4434 to be at least 98%

pure d-methamphetamine hydrochloride, a Schedule II controlled substance, weighing a total of 2214 grams).

- 15. On September 11, 2017, USPIS and USPS OIG conducted a live test of the delivery of East Silsby Parcel 4434, handled by Beachwood Letter Carrier Marquacia Morris. At approximately 1:54 p.m., investigators observed Morris handing off East Silsby Parcel 4434 to Devon Williams at an apartment complex in Beachwood, Ohio, and immediately arrested Morris. Investigators followed Devon Williams to another apartment complex in Richmond Heights, Ohio, and arrested him at approximately 2:39 p.m.
- 16. In subsequent interviews, Morris stated BROWN had recruited her to facilitate the distribution of drug parcels, including East Silsby Parcel 4434, via her position as a Letter Carrier. Morris provided corroborating information, including a physical description and previous residence for BROWN and information on previous parcels she had diverted for BROWN. Morris's cellular telephone (216-716-0705) also contained text messages pertaining to her arrangement with BROWN.
- 17. On September 28, 2017, I obtained a federal search warrant (1:17 MJ 3253) for a cellular telephone seized incident to arrest from Williams. A search of the cellular telephone revealed the following "Whatsapp" conversation with the number 330-294-8805 on September 11, 2017:

Party	Time	Content
Williams	11:58 a.m.	Send her number???
330-294-8805	12:19 p.m.	7160705 [Morris's cellular telephone]
Williams	12:21 p.m.	Cool
330-294-8805	12:24 p.m.	Pu*sy

Williams	12:24 p.m.	I can fight real good
Williams	2:08 p.m.	What's next pus
330-294-8805	2:08 p.m.	Put it up pu*sy
Williams	2:08 p.m.	["OK" emoji]
330-294-8805	2:26 p.m.	[Missed video call to Williams]
330-294-8805	2:27 p.m.	[Missed video call to Williams]
330-294-8805	2:27 p.m.	[Missed video call to Williams]
330-294-8805	2:28 p.m.	[Missed video call to Williams]
330-294-8805	2:29 p.m.	[Missed video call to Williams]
330-294-8805	2:38 p.m.	[Missed video call to Williams]
330-294-8805	2:38 p.m.	They got her
330-294-8805	2:38 p.m.	Smh ["Shake my head"]
330-294-8805	2:38 p.m.	Call me

- 18. Further review of the Whatsapp conversation revealed a message sent from 330-294-8805 to Williams instructing him to "Call mail lady hoe give her a band [\$1,000] b*tch." The Whatsapp conversation also included a message sent from Williams to 330-294-8805 containing a photo of a parcel addressed to 23314 East Groveland Road, Beachwood, OH 44122 [a delivery address Morris provided to BROWN to use on drug parcels]. Finally, the Whatsapp conversation included a message sent from 330-294-8805 to Williams containing a video of BROWN riding what appeared to be a motorcycle.
- 19. Based upon the information contained in this affidavit, I submit there is probable cause to believe that on or about June 12, 2017, in the Northern District of Ohio, Corey BROWN

committed violations of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846, that is conspiracy to distribute and distribution of 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance. I also submit there is probable cause to believe that on or about September 11, 2017, in the Northern District of Ohio, Corey BROWN committed violations of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846, that is conspiracy to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

MYRICK DENNIS

U.S. POSTAL INSPECTOR

U.S. POSTAL INSPECTION SERVICE

This affidavit was sworn to by the affiant, who did no more than attest to its contents pursuant to Crim. R. 4.1(b)(2)(A), by telephone after a PDF was transmitted by email, per Crim R. 4.1.

JONATHAN D. GREENBERG

U.S. MA GISTRATE JUDGE

01-24-18